

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY  
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DATE FILED: 2/28/2020

TAKE-TWO INTERACTIVE SOFTWARE  
INC.,

Plaintiff,

v.

JOHNATHAN WYCKOFF and JOHN  
DOES 1–10,

Defendants.

CASE NO. 1:19-cv-11818-VEC

ECF Case

**STIPULATION AND [PROPOSED]**  
**PRELIMINARY INJUNCTION**  
**AGAINST DEFENDANT JOHNATHAN**  
**WYCKOFF**

WHEREAS, Take-Two Interactive Software, Inc. (“Take-Two”) filed a complaint alleging direct copyright infringement, contributory copyright infringement, breach of contract, and tortious interference with contract (Dkt. No. 1) against Defendant Johnathan Wyckoff (“Mr. Wyckoff”);

WHEREAS, Take-Two filed a motion for a preliminary injunction against Mr. Wyckoff (Dkt. No. 10);

WHEREAS, Mr. Wyckoff did not file an opposition to Take-Two’s motion and consents to the issuance of Take-Two’s requested injunction;

NOW, THEREFORE, upon the consent and request of Take-Two and Mr. Wyckoff, IT IS HEREBY STIPULATED AND AGREED THAT:

1. Defendant Johnathan Wyckoff, and all persons acting in concert or participation with him, is enjoined from directly or indirectly infringing Take-Two’s copyrights, including, but not limited to, (a) creating derivative works based upon any portion of Take-Two’s video games, including *Grand Theft Auto V*, *Red Dead Redemption*, and *Red Dead Redemption II*; (b) producing or distributing any computer programs that alter Take-Two’s games, including

without limitation the *Red Dead Redemption Damned Enhancement Project* and the *Red Dead Redemption II Project*; and (c) from participating or assisting in any such activities (hereinafter, the “Preliminary Injunction”).

2. This Preliminary Injunction shall take effect immediately and shall remain in effect pending trial in this action or further order of this Court.

3. The Court shall retain jurisdiction to entertain such further proceedings and to enter such further orders as may be necessary or appropriate to implement and/or enforce the provisions of this preliminary injunction.

4. Mr. Wyckoff affirms that his consent to this Stipulation is given freely and voluntarily, and after having had the opportunity to discuss same with legal counsel.

DATED: February 28, 2020

KIRKLAND & ELLIS LLP

DATED: February 28, 2020

THE LAW FIRM OF LEONARD J.  
FRENCH

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Attorney for Defendant Johnathan  
Wyckoff

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: February 28, 2020



HON. VALERIE E. CAPRONI  
United States District Judge